

**SEALED**

**BY ORDER OF THE COURT**

KENJI M. PRICE #10523  
United States Attorney  
District of Hawaii

COREY R. AMUNDSON  
Chief, Public Integrity Section  
United States Department of Justice

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JOHN D. KELLER  
Principal Deputy Chief

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
*Aug 31, 2020*  
Michelle Rynne, Clerk of Court

SEAN F. MULRYNE  
Deputy Director, Election Crimes  
NICOLE R. LOCKHART  
JAMES C. MANN  
Trial Attorneys  
Public Integrity Section

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,  
  
Plaintiff,

vs.

NICKIE MALI LUM DAVIS,  
  
Defendant.

) CR. NO. 20-00068 LEK  
) **UNDER SEAL**  
)  
) ADDENDUM TO  
) MEMORANDUM OF PLEA  
) AGREEMENT  
)  
) DATE: August 31, 2020  
) TIME: 11:00 a.m.  
) JUDGE: Leslie E. Kobayashi  
)

**SEALED ADDENDUM TO MEMORANDUM OF PLEA AGREEMENT**

Pursuant to Rule 11 of the Federal Rules of Criminal Procedure, the UNITED STATES OF AMERICA, by its undersigned attorneys, and the defendant, NICKIE MALI LUM DAVIS, and her attorneys, William C. McCorriston, Esq. and Abbe


David Lowell, Esq., have agreed upon the following addendum to the Memorandum of Plea Agreement, to be filed under seal to avoid potentially alerting subjects of ongoing criminal investigations of the investigations and to avoid the risk of unnecessarily identifying uncharged third parties whose conduct is not at issue in the Information to which the defendant is pleading.

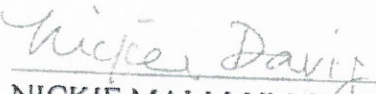
**WAIVER OF POTENTIAL CONFLICT OF INTEREST**

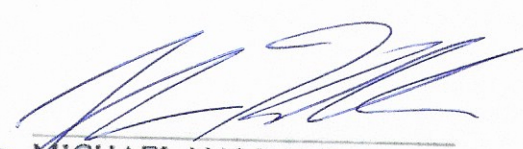
The defendant understands that the United States Department of Justice has raised with one of her attorneys, Abbe D. Lowell, his previous representation of certain individuals with whom Ms. Davis also has had contact or interactions and whose names have or might come up during her cooperation and of certain other individuals on matters unrelated to Ms. Davis. Ms. Davis has discussed these issues and the resulting potential for conflicts of interest with Mr. Lowell and with third-party counsel and knowingly and intelligently waives any potential or actual conflict of interest as to Mr. Lowell and affirms that she wishes to proceed with Mr. Lowell as one of her attorneys in this matter.

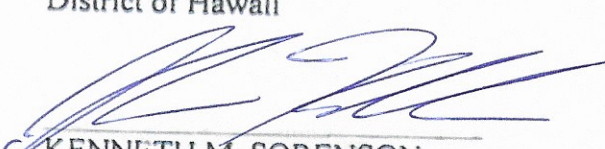
DATED: Honolulu, Hawaii, August 28, 2020

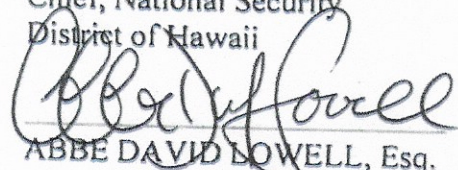
COREY R. AMUNDSON  
Chief, Public Integrity Section  
United States Department of Justice

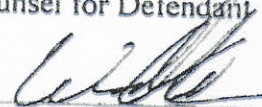
  
By: JOHN D. KELLER  
Principal Deputy Chief  
Sean F. Mulryne  
Deputy Director, Election Crimes  
Nicole R. Lockhart  
James C. Mann  
Trial Attorneys  
Public Integrity Section

  
NICKIE MALI LUM DAVIS  
Defendant

  
for MICHAEL NAMMAR  
Chief, Criminal Division  
District of Hawaii

  
for KENNETH M. SORENSON  
Chief, National Security  
District of Hawaii

  
ABBE DAVID LOWELL, Esq.  
Counsel for Defendant

  
WILLIAM C. MCCORRISTON, Esq.  
Counsel for Defendant